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Hearing Date: July 14, 2010

Time: 10:00 a.m.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In re: -----

LEHMAN BROTHERS HOLDINGS INC., *et al.*,

Debtor.
-----X

Chapter 11 - Jointly Administered
Case No. 08-13555 (JMP)

**NOTICE OF MOTION OF JP MORGAN CHASE BANK, N.A.
FOR RELIEF FROM THE AUTOMATIC STAY**

PLEASE TAKE NOTICE, that upon the annexed Memorandum in Support, dated June 7, 2010, and the accompanying Affidavit of Preston Koerner sworn to on June 2, 2010, and the exhibits annexed thereto (the "Motion"), JP Morgan Chase Bank, N.A. ("JP Morgan"), by and through its undersigned counsel, will move this court before the Honorable James M. Peck, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004, on the 14th day of July, 2010 at 10:00 a.m., or as soon thereafter as counsel may be heard, for the entry of an Order, pursuant to 11 U.S.C. §362(d)(1) and (d)(2), modifying the automatic stay with regard to debtor BNC Mortgage, Inc. (Case No. 09-10137 (JMP)) so as to permit the continuation, through the entry of judgment, of a certain state court action to quiet title in and to certain real property located at 8380 S. 2200 W., West Jordan, Utah 84088, pending in the Third District Court for the State of Utah, and titled *Birschbach*

v. *BNC Mortgage, et.al.*, Civil No. 060900901, and granting such other and further relief as this Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motion shall (i) be made in writing, (ii) conform to the Federal Rules of Bankruptcy Procedure and the Local Rules for the United States Bankruptcy Court for the Southern District of New York, (iii) be filed with the Court with a copy to the chambers of Honorable James M. Peck, together with proof of service thereof, and (iv) be served in a manner so as to be received by Pick & Zabicki LLP, 369 Lexington Avenue, 12th Floor, New York, New York 10017, Attn.: Eric C. Zabicki, Esq., by not later than July 7, 2010 at 5:00 p.m.

Dated: New York, New York
June 7, 2010

PICK & ZABICKI LLP
Counsel to JP Morgan Chase Bank, N.A.

By: 

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